SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO SAN BERNARDINO DISTRICT

THE PEOPLE OF THE STATE OF	CALIFORNIA,	COURT CASE NO
	Plaintiff	
vs. Lavelle Robert Miller , Taron Markel Anderson , Lemonta Markuis Maddox)))	FELONY COMPLAINT
)	DA CASE NO 2012-00-0010109
	Defendant	

The undersigned is informed and believes that:

COUNT 1

On or about February 27, 2012, in the above named judicial district, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Lavelle Robert Miller, Taron Markel Anderson and Lemonta Markuis Maddox, who did unlawfully, and with malice aforethought murder Anthony Dewayne Mitchell, a human being.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

It is further alleged pursuant to Penal Code section 186.22(b)(1)(C) as to counts 1 that the above offense was committed for the benefit of, at the direction of, or in association with a criminal street gang with the specific intent to promote, further or assist in criminal conduct by gang members.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section 186.30(a). Willful failure to register is a crime."

It is further alleged as to count 1 that a principal personally used a firearm, a handgun, within the meaning of Penal Code sections 12022.53(b) and (e)(1).

It is further alleged as to count 1, pursuant to subdivision (d)(2)(C)(ii) of section 707 of the Welfare and Institutions Code, that the Lavelle Robert Miller was a minor who was at least 14 years of age at the time of the commission of the above offense, and that the above offense was committed for the benefit and at the direction of, and in association with a criminal street gang, and with the intent to promote, further, and assist in criminal conduct by gang members.

It is further alleged as to count 1 that a principal personally and intentionally discharged a firearm, a handgun, which proximately caused great bodily injury and death to Anthony Dewayne Mitchell within the meaning of Penal Code sections 12022.53(d) and (e)(1).

It is further alleged as to count 1 that a principal personally and intentionally discharged a firearm, a handgun, within the meaning of Penal Code sections 12022.53(c) and (e)(1).

It is further alleged as to count 1 that a principal personally used a firearm, a handgun, within the meaning of Penal Code sections 12022.53(b) and (e)(1).

It is further alleged as to count 1 that said defendant Lemonta Markuis Maddox personally and intentionally discharged a firearm, a handgun, which caused great bodily injury and death to Anthony Dewayne Mitchell within the meaning of Penal Code Section 12022.53(d) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8). It is further alleged as to count 1 that said defendant Lemonta Markuis Maddox personally and intentionally discharged a firearm, a handgun, within the meaning of Penal Code Section 12022.53(c) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8). It is further alleged as to count 1 that said defendant Lemonta Markuis Maddox personally used a firearm, a handgun,

within the meaning of Penal Code Section 12022.53(b) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

It is further alleged as to count 1, pursuant to subdivision (d)(1) of Section 707 of the Welfare and Institutions code, that the Taron Markel Anderson was a minor who was at least 16 years of age the time of the commission of the above offense.

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NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 1 COUNT(S).

Executed at San Bernardino, California, on February 29, 2012.

S Sanchez

S Sanchez
DECLARANT AND COMPLAINANT

Agency: San Bernardino Police Department Prelim Est. 00:00

Defendant Birth Date Booking No. CII No. NCIC

Lavelle Robert Miller 10/12/1996 Taron Markel Anderson 07/09/1995

Lemonta Markuis Maddox 02/11/1994 1202343075 A32389999

Gang